



City of Seattle CLAIM FOR DAMAGES

Note:
Type or Print Legibly.
See instructions on back.

CITY USE ONLY

CLAIM NUMBER

DATE FILED

CLAIMANT	NAME (FIRST - MIDDLE - LAST, OR BUSINESS NAME) Mary Celeste Park	DATE OF BIRTH 3/9/1958	HOME PHONE (206) 935-6160
CURRENT HOME ADDRESS (NUMBER - STREET - CITY - STATE - ZIP) 3416 61st Ave. SW, Seattle, WA 98116			BUS. PHONE None
HOME ADDRESS AT THE TIME THE CLAIM AROSE (NUMBER - STREET - CITY - STATE - ZIP) (Same as above)		CELL PHONE (206) 209-6707	E-MAIL ADDRESS carolandtom3032@comcast.net

ACCIDENT/LOSS	DATE On or about August 22, 2012	TIME	DIAGRAM Use if this will help you locate or describe what happened
LOCATION/SITE	BE VERY SPECIFIC: STREETS, ADDRESSES, etc. Detective Litalien made defamatory per se statements with malice to the press, including but not limited to the Seattle P.I. and the UPI concerning Mary Park. See Exhibits 4 and 5.		
WHAT HAPPENED?	DESCRIBE IN YOUR OWN WORDS HOW THIS LOSS OCCURRED AND WHY YOU BELIEVE THE CITY IS RESPONSIBLE. (additional space on reverse side or attach additional pages and supportive documents as needed) Detective Elizabeth Litalien published false, malicious, defamatory per se statements to the press and others, without privilege, accusing Park of theft and abuse of Hermine Berner. Park refers to the claim filed with the City on 8/15/2014 for additional facts about the illegal investigation and see attached Exhibits.		
NAMES, ADDRESSES, AND PHONE NUMBERS OF ALL PERSONS INVOLVED IN OR WITNESS TO THIS INCIDENT *		CITY DEPT?	
1) Det. Elizabeth M. Litalien Badge No. 6289 Seattle Police Department Ph: (206) 625-5011		2) Casey McNerthney SEATTLEPI.COM 2901 3rd Ave, Ste 120 Seattle, WA 98121 Ph: (206) 448-8030	
		3) United Press International 1133 19th St. N.W. Washington, DC 20036 Ph: (202) 898-8000	
* See attached Exhibit 2 for additional persons involved in or witnesses to this incident.			

WAS YOUR PROPERTY DAMAGED? (i.e. Home, Auto, Personal Property)

☐ YES IF SO, THEN FULLY DESCRIBE - SUCH AS AGE, MAKE, MODEL, CONDITION, VALUE, OR EXTENT OF DAMAGE

☒ NO (additional space on reverse side or attach additional pages and supportive documents as needed)

WERE YOU INJURED? ☒ YES IF YES, THEN COMPLETE THE FOLLOWING:

☐ NO (additional space on reverse side or attach additional pages and supportive documents as needed)

DESCRIBE YOUR INJURY (IDENTIFY YOUR DOCTOR(S)) Pain and suffering, loss of reputation, shame, mortification, hurt feelings, emotional distress, costs and attorney fees. See attached Exhibit 3 for names of health care providers.

WAGE LOSS ☒ YES ☐ NO IF YES, THEN RATE OF PAY: \$20

KIND OF WORK Caregiver (at time of incident) EMPLOYER Capco Liquer Store (presently)

AMOUNT CLAIMED \$ 1,000,000

SIGNATURE OF CLAIMANT
(AND TITLE, IF A BUSINESS)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct

This claim form must be signed by the Claimant, verifying the claim; or pursuant to a written power of attorney, by the attorney in fact for the claimant; or by an attorney admitted to practice in Washington State on the claimant's behalf; or by a court-approved guardian or guardian ad litem on behalf of the claimant.

EXECUTED this 18th day of August, 2014,

At Seattle, King County, Washington

X

Mark J. Wilson, WSBA No. 16675 for Mary Park
500 Union Street, Suite 502, Seattle, WA 98101
Tel: (206) 567-9826; Fax: (206) 567-9827

PRESENTATION OF A CLAIM

This official City of Seattle document must be signed, and mailed or delivered

Mail to:
CITY CLERK'S OFFICE
PO BOX 94728
Seattle, WA 98124-4728

Deliver to:
CITY HALL
600 Fourth Avenue, 3rd Floor
Between James St. & Cherry St.
Business Hours: Monday-Friday, 8:00 AM-5:00 PM
Closed on Weekends and Official City of Seattle Holidays

An adjuster will be assigned to your claim after it is filed with the City Clerk's Office. **It is to your advantage** to present with your claim relevant supporting documents (receipts, cancelled checks, estimates, billings, etc.) or additional evidence (photos, diagrams, etc.). All documents are subject to the Washington State Public Disclosure Statutes. Additional Claim forms can be downloaded from the Risk Management website. (<http://www.seattle.gov/riskmanagement>)

EXPLANATION OF THE CLAIMS PROCESS

The day after your Claim is filed in the City Clerk's Office, it is delivered to the Claims Section. The Claim is then assigned to an adjuster who will conduct an investigation which includes a written response from the involved department. The Claims Section will then evaluate and recommend a reasonable resolution of your Claim, which will be one of three alternatives

1. Pay a sum of money
2. Tender – transfer to another party or entity responsible for your alleged damage
3. Deny – where there is no evidence of any negligence by the City

If you have any questions, then do not hesitate to call the Claims Section at 206-684-8213.

CS 19.10 REV. 11/09

THIS SPACE PROVIDED FOR ADDITIONAL INFORMATION

Index to Exhibits

-
1. Description of occurrence and basis of liability (Continued from Page 1)
 2. Additional persons involved in or witnesses to this incident (Continued from Page 1)
 3. Health care providers pertaining to treatment related to this incident (Continued from Page 1)
 4. Seattle Post Intelligencer Article of August 22, 2012, Updated dated October 19, 2012
 5. United Press International (UPI) Article of August 23, 2012
 6. Excerpts of Elizabeth Litalien Deposition
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City of Seattle Claim for Damages Form
Claim of Mary Celeste Park
(Defamation Per Se)

EXHIBIT 1

Description of Occurrence and Basis of Liability
(Continued from Page 1)

City of Seattle Claim for Damages Form

Claim of Mary Celeste Park

(Defamation Per Se)

Exhibit 1

Description of Occurrence and Basis of Liability

(Response to “What Happened” Section from Page 1 of August 18, 2014 Claim Form)

1. Mary Park files this claim for money damages against Detective Elizabeth Litalien, of the Seattle Police Department (SPD), for defamation per se.
2. A plaintiff must establish four essential elements for a defamation claim, all of which are present here: (1) falsity; (2) an unprivileged communication; (3) fault; and (4) damages. *Bender v. Seattle*, 99 Wn.2d 582, 599, 664 P.2d 492 (1983). Furthermore, the evidence support’s claim that Litalien acted with actual malice, that is, knowledge of falsity or reckless disregard of the truth or falsity.
3. On January 21, 2014, Litalien was deposed in a civil defamation case Park filed against Judy and Lewis Townsend and Hermine and Emanuel Berner. Exhibit 6. In her deposition, Litalien denied ever talking to the press about her investigation of Park. Exhibit 6, pp. 127-128. This appears to be false. Park has discovered at least two instances where Litalien published defamatory per se statements about Park to the press related to the accusations of theft and abuse that Litalien was actively investigating.
4. The instances Park has discovered so far where Litalien appears to have made statements to the press are defamatory per se. We believe we will discover additional defamatory statements that Litalien tried to conceal.
5. For purposes of this defamation claim, Park refers to the description of events and documents attached to the Claim she filed on August 15, 2014 against the City of Seattle, the Seattle Police Department and Litalien for violation of Mary Park’s constitutional and common law rights arising out of a criminal investigation conducted by Litalien and the unlawful, reckless, malicious, search, seizure, arrest and prosecution of Park without probable cause by Litalien. The facts and documents in support of those claims are relevant to and support Park’s claim of liability against Litalien for defamation per se.
6. As stated in Park’s Claim dated August 15, 2012, Litalien unlawfully, recklessly and maliciously fabricated evidence, concealed exculpatory evidence, swore to false statements before prosecutors and the court and falsely claimed to them that probable cause existed that Park had committed theft.

7. The accusations of theft and abuse against Park were false and Litalien knew or maliciously and recklessly disregarded that fact when she spoke to the press. Under these circumstances, Litalien cannot hide behind her badge and claim immunity from this claim of defamation.
8. As a proximate result of the publication of defamatory per se statements by Litalien to the press, Park has suffered loss of her reputation, shame, mortification, hurt feelings and severe emotional distress.
9. The statements published by Litalien to the SeattlePI.com and the UPI, and perhaps there are many more that she has concealed, are defamatory per se in that they expose Park to hatred, contempt, ridicule, or obloquy so as to deprive Park of the benefit of public confidence or social intercourse, injures her in her business or profession, including but not limited to that of caregiver and falsely imputes to her criminal conduct involving moral turpitude. Should this case go to trial and because Litalien committed defamation per se, the jury will be permitted to presume damages for loss of reputation without any necessity that Park prove actual monetary damages.
10. The damages suffered by Park as a proximate result of Litalien's defamation per se are in excess of \$1,000,000.

Thank you for your consideration of this claim. If you require any additional information, please do not hesitate to contact Mary Park's legal counsel, as follows:

Mark J. Wilson
Attorney at Law
500 Union Street, Suite 502
Seattle, WA 98101
Telephone: (206) 567-9826
Fax: (206) 567-9827
e-mail: mjwilson@mjwilsonlawyer.com

City of Seattle Claim for Damages Form
Claim of Mary Celeste Park
(Defamation Per Se)

EXHIBIT 2

Additional Persons Involved in or Witnesses to
this Incident (Continued from Page 1)

City of Seattle Claim for Damages Form

Claim of Mary Celeste Park

(Defamation Per Se)

Exhibit 2

Additional Persons Involved in or Witnesses to This Incident

(Continued from Page 1)

Lieutenant Brett J. Rogers
Badge No. 6159
Seattle Police Department
(206) 625-5011

Detective Diane Stone
Seattle Police Department
(206) 625-5011

Donna Stangland
Detective
Seattle Police Department
(206) 625-05011

Sgt. Guy Pratt
Southwest Precinct
Seattle Police Department
(206) 625-05011

Eugene Foster
Detective, Badge #6289
Seattle Police Department
(206) 625-05011

Lt. Pierre Davis
Southwest Precinct
Seattle Police Department
(206) 625-05011

John Henry Browne
108 S. Washington St
Seattle, WA 98104
(206) 388-0777

Suzan R. Wilson
2331 46th Ave SW
Seattle, WA 98116
(206) 935-4744

Judy Townsend
3426 63rd Ave W.
Seattle, WA 98116
(206) 498-7220

Hermine Berner
4021 Beach Dr. SW #202
Seattle, WA 98116
(206) 937-7614

City of Seattle Claim for Damages Form

Claim of Mary Celeste Park

(Defamation Per Se)

EXHIBIT 3

Health Care Providers Pertaining to Treatment
Related to this Incident (Continued from Page 1)

City of Seattle Claim for Damages Form

Claim of Mary Celeste Park

(Defamation Per Se)

Exhibit 3

Health care providers pertaining to treatment related to this incident
(Continued from Page 1)

Primary Care Physician:

Dr. Alice Krehbiel
The Polyclinic
509 Olive Way #900
Seattle, WA 98101
(206) 860-4700

Psychotherapist:

Suzan R. Wilson, M.A., L.M.F.T., L.M.H.C.
2331 46th Ave SW
Seattle, WA 98116
206-935-4744

City of Seattle Claim for Damages Form
Claim of Mary Celeste Park
(Defamation Per Se)

EXHIBIT 4

Seattle Post Intelligencer Article of August 22,
2012, Updated dated October 19, 2012

The screenshot shows a web browser window displaying the Seattle Post-Intelligencer website. The article title is "Charge: Caregiver stole \$50K from woman, 91" with a subtitle "Victims kept money in kitch after trauma from World War II". The byline is "By CASEY McERTHNEY, SEATTLEPI.COM STAFF" and the date is "Updated 9:00 am, Friday, October 19, 2012". The article text describes how a 91-year-old woman, Mary Celeste Park, was charged with first-degree theft after stealing \$50,000 from her elderly employer. The article mentions that the woman's family was sent to the Auschwitz concentration camp during World War II. The article also includes an update from October 18, 2012, stating that the charges against Mary Park were dismissed without prejudice. The right side of the page features a video player titled "How Parkinson's Disease Has Affected Hollywood" and a "You Might Also Like" section with various article thumbnails.

Charge: Caregiver stole \$50K from woman, 91
Victims kept money in kitch after trauma from World War II

By CASEY McERTHNEY, SEATTLEPI.COM STAFF
Updated 9:00 am, Friday, October 19, 2012

UPDATE: The charges against caregiver Mary Park were dismissed without prejudice on Thursday, Oct. 18, 2012, after prosecutors determined they were unable to prove their case at that time. A full report on that dismissal can be found [here](#). The initial report below has not been modified since it was published Aug. 22, 2012.

A 91-year-old woman who kept her savings in her Seattle condo had more than \$50,000 stolen by the woman hired to care for her, prosecutors allege.

The woman's family was sent to the Auschwitz concentration camp during World War II. She and her sister were already in America and were the only ones to survive.

It was the trauma of what her family endured during the war that made the woman want to keep her cash in her condo where she lives with her elderly husband, police documents show.

The caregiver, Mary Park, has been charged with first-degree theft. She has not entered a plea, and her arraignment is scheduled for Aug. 30.

The elderly victim kept \$50,000 in \$100 bills in her kitchen pantry and also had additional cash around the home, police said. Park had worked at a Seattle nursing home and was referred to the family by a friend.

Because of her work at the nursing home, the family assumed she had undergone a background check. Still, Park has no criminal history.

Park was hired in February by the elderly couple's daughter to ensure the parents would get a hot meal at least once a day. The family said they became very fond of Park and that the elderly parents considered her family.

However, after she was hired, the daughter recalled her mother talking about missing cardiac medication pills. It was initially thought that the 91-year-old mother was confused, though the daughter later believed Park was withholding the pills, according to police.

The elderly woman accused Park of taking money from her in July. The daughter begged Park not to quit, saying she her mother must have been confused, according to court documents.

The daughter told police Park's behavior changed that month: She allegedly made excuses for not taking her mother on walks or not taking her to Starbucks to socialize. The woman and her husband then asked Park to be with the parents only two hours a week.

Park said in a text message that she had a waiting list and others she could recommend, and that it was OK to be let go, according to investigation documents.

She later said that she could barely live on \$12 an hour, that she was working five hours a day for another woman at \$18 an hour, and that perhaps the daughter should look for someone who did not care about the elderly woman as much as she did, according to court documents.

Park allegedly said she didn't think two hours a day was enough time to do all the things they were asking of her.

On July 31, the elderly mother told her daughter that Park had brought groceries when it was still dark, before 6 a.m. – hours earlier than her usual arrival time – and that she wanted to be let into the condo. The woman told police she let Park into the common area, but not into the

How Parkinson's Disease Has Affected Hollywood
Entertainment Tonight

More videos:

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TODAY'S TOP HEADLINES
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Exhibit 4 (continued)

Charge: Caregiver stole \$50K from woman, 91 - seattlepi.com - Mozilla Firefox

www.seattlepi.com/default/article/Charge-Caregiver-stole-50K-from-woman-91

On July 31, the elderly mother told her daughter that Park had brought groceries when it was still dark, before 6 a.m. – hours earlier than her usual arrival time – and that she wanted to be let into the condo. The woman told police she let Park into the common area, but not into the condo. The daughter had instructed her mother not to let Park in the residence.

The daughter told Seattle Police Det. Elizabeth Litalien that on Aug. 3 she and her husband searched every part of her parents' condo but could not find the \$50,000 that had been hidden in the pantry. They also couldn't find other cash that her mother had stashed around the residence as a way to feel reassured.

The elderly woman and her daughter told police no one other than Park had been in the condo since Park had found \$50,000 cash, court documents show.

A few days before the money went missing, the 91-year-old said Park talked about putting new contact paper on the kitchen pantry shelves. Police were told that when Park found the \$50,000, the elderly woman gave her \$100.

"Since Mary has left, (the elderly woman) has improved mentally and physically," Litalien wrote. "She is no longer fatigued. (Her daughter) believes that it is possible that Mary was withholding (her mother's) cardiac pulls from her intentionally. (The mother) has not reported that any pills missing since Mary has left."

On Aug. 15, Litalien served a search warrant on Park's West Seattle home.

"I spoke with Mary and she stated that she did not know that (the elderly woman) had \$50,000 in her house," Litalien wrote in a probable cause document. "She said that she never saw the money."

"She stated that when she replaced (the woman's) contact paper that she found \$900 under the contact paper. She said that (the elderly woman) gave her \$100. I asked what had happened to the other \$800 and she said that she gave it back to (the woman) and that she must have listed."

Park told the detective the 91-year-old is very confused. Park also allegedly said she told the daughter about the \$900 right away.

"She offered to give the \$100 back," Litalien wrote. "I confirmed with Judy that Mary had never told her about the money and that \$800 was not located in the ... condo."

Casey McNerthney can be reached at 206-448-8220 or at caseymcnerthney@seattlepi.com. Follow Casey on Twitter at twitter.com/mcnerthney.

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- **Where Did They Go? 10 Award-Winning Actors Who Don't Act Anymore** (Wall St. Cheat Sheet)
- **Casey Anthony: Her Strange Life 3 Years Later** (People)
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7. Revel wanted to close Atlantic City casino Monday

City of Seattle Claim for Damages Form
Claim of Mary Celeste Park
(Defamation Per Se)

EXHIBIT 5

United Press International (UPI) Article of
August 23, 2012

International (UPI) Article of August 23, 2012; From url:

http://www.upi.com/Top_News/US/2012/08/23/Caregiver-accused-of-stealing-50K/UPI-

Fwd: an article from UPI.co... x UPI Caregiver accused of steali... x

www.upi.com/Top_News/US/2012/08/23/Caregiver-accused-of-stealing-50K/UP

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f t r i K

TOP NEWS

HOME / TOP NEWS / U.S. NEWS / CAREGIVER ACCUSED OF STEALING \$50K

Caregiver accused of stealing \$50K

Aug. 23, 2012 at 4:16 PM | 0 Comments (Leave a comment)

f SEATTLE, Aug. 23 (UPI) -- The caregiver of a 91-year-old Seattle woman is facing charges she stole \$50,000 that had been hidden in a pantry.

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Investigators also say Mary Park, who is to be arraigned next week on theft charges, also may have withheld cardiac medication from her charge, the Seattle Post-Intelligencer reported.

Park allegedly found the money after telling the woman she wanted to repaper the pantry shelves. The alleged theft was believed to have occurred July 31 after Park arrived at the victim's condo before 6 a.m., long before she was scheduled to work.

The victim's daughter said Park apparently was dissatisfied she was being paid just \$12 an hour and thought she was being asked to do too much in the tow hours a day she worked for the family, Detective Elizabeth Litalien told the newspaper.

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TRENDING NEWS



Underwear models are now delivering alcohol to Los Angeles residents



Notable deaths of 2014 [PHOTOS]



Feedback

x

Disqus seems to be taking longer than usual. Reload?

EXHIBIT 5

City of Seattle Claim for Damages Form
Claim of Mary Celeste Park
(Defamation Per Se)

EXHIBIT 6

Elizabeth Litalien Deposition – Excerpt of
Transcript, Vl. 1)

<p style="text-align: right;">Page 1</p> <p>1 IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON 2 IN AND FOR THE COUNTY OF KING 3 4 MARY CELESTE PARK, an individual,) 5) 6 Plaintiff,) 7) 8 vs.) Case No. 9) 13-2-14612-6 SEA 10 JUDY TOWNSEND and LEWIS) 11 TOWNSEND, wife and husband and the) 12 marital community composed thereof,) 13 HERMINE BERNER and EMANUEL) 14 BERNER, wife and husband and the marital) 15 community composed thereof,) 16) 17 Defendants.) 18 19 20 21 22 23 24 VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION 25 OF 26 27 ELIZABETH LITALIEN - VOLUME I 28 29 30 Taken at 1411 Fourth Avenue, Suite 820 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 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990 991 992 993 994 995 996 997 998 999 1000</p>
<p style="text-align: right;">Page 2</p>	

<p style="text-align: right;">Page 125</p> <p>1 never even said one word that she took the money.</p> <p>2 "Litalien: After you accused her of taking the</p> <p>3 money, did she come back? Besides the groceries, did she</p> <p>4 come back to work?</p> <p>5 "No, she didn't. No."</p> <p>6 And next page,</p> <p>7 "Litalien: And do you think that's about the time</p> <p>8 she -- what -- was the last day she worked here, is that</p> <p>9 the day she left you in the bathtub?</p> <p>10 "Berner: Yeah.</p> <p>11 "Litalien: Had she ever done that before?</p> <p>12 "Berner: No. No, she -- she didn't."</p> <p>13 So does that satisfy -- did that satisfy you at the</p> <p>14 time that Hermine was telling you the truth about Mary's</p> <p>15 treatment of her?</p> <p>16 A. No. Did it satisfy me? I would say that I already</p> <p>17 knew she was experiencing, you know, what -- what was being</p> <p>18 described as PTSD. She was having flash -- alleged flashbacks.</p> <p>19 She was agitated.</p> <p>20 So, no, I wouldn't say it satisfied me. I think there</p> <p>21 were problems when the camera would go on. When the camera</p> <p>22 went on, she totally, you know, trans -- I shouldn't say</p> <p>23 totally transformed, but she became -- using the word nervous,</p> <p>24 but it's more she -- I guess she became nervous and she was too</p> <p>25 focused on the fact that she was being videotaped.</p>	<p style="text-align: right;">Page 127</p> <p>1 interview with her, because our recorded interviews are almost</p> <p>2 always transcribed, and we like to keep them narrowed down as</p> <p>3 best as we can. We don't want to hand over a transcription</p> <p>4 that's an hour long.</p> <p>5 So I tend to go over with the complainant, with the</p> <p>6 victim usually what happened, and then at a later time I go</p> <p>7 back and take an -- and do an interview when I can just narrow</p> <p>8 it down much more. And especially in Judy's case, she goes off</p> <p>9 on tangents.</p> <p>10 Q. Shouldn't you have done that before you had Mary</p> <p>11 arrested?</p> <p>12 A. I don't feel I needed to, no. I felt Judy was</p> <p>13 consistent in what she told me when I talked to her each time.</p> <p>14 Q. Did you understand the gravity of arresting Mary for</p> <p>15 this -- for this crime of abusing and stealing from her ward</p> <p>16 when she's a caretaker? Did you know how serious that was?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know how much publicity that incident caused in</p> <p>19 this -- in this community?</p> <p>20 A. No.</p> <p>21 Q. Did you see any of the press reports?</p> <p>22 A. No.</p> <p>23 Q. You didn't see CNN? You didn't see Q13? KOMO 4?</p> <p>24 A. No.</p> <p>25 Q. None of that?</p>
<p style="text-align: right;">Page 126</p> <p>1 She was much more relaxed when the videotape was off.</p> <p>2 I was not satisfied with her interview. I mean, I think that</p> <p>3 she was exhibiting signs of nervousness, confusion.</p> <p>4 Q. You -- you took Judy's interview on videotape on</p> <p>5 September 20th, didn't you?</p> <p>6 A. No. Judy? No.</p> <p>7 Q. Judy?</p> <p>8 A. Are you talking about audio? It's audio.</p> <p>9 Q. Audio.</p> <p>10 A. Recorded.</p> <p>11 Q. Oh, okay. I'm sorry. So you audio taped an interview</p> <p>12 with Judy on September 20th, which is after the criminal</p> <p>13 complaint -- well, your -- your Certification for Probable</p> <p>14 Cause was filed with the court; correct?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. That was in October. I'm sorry. That was --</p> <p>17 that was on August 17th. And so in September, a little more</p> <p>18 than a month later, you interviewed Judy on -- on audio tape.</p> <p>19 Why -- why did you do that at that time?</p> <p>20 A. Because it's -- it's long and involved, and Judy can</p> <p>21 go off on tangents and other things. My initial -- my</p> <p>22 initial -- initially I just wanted to get the story down, what</p> <p>23 was being told, what was alleged to have happened. And that I</p> <p>24 did with her over the phone.</p> <p>25 But right off the bat, I didn't take a recorded</p>	<p style="text-align: right;">Page 128</p> <p>1 A. No.</p> <p>2 Q. Did you ever talk to the press?</p> <p>3 A. No.</p> <p>4 Q. Were you ever contacted by the press?</p> <p>5 A. I do not recall being contacted by the press.</p> <p>6 Q. So af -- before you took -- I'm sorry. So you -- you</p> <p>7 sought and submitted an affidavit in support of a search</p> <p>8 warrant, didn't you?</p> <p>9 A. Yes.</p> <p>10 Q. Let me get that. Did you also request an arrest</p> <p>11 warrant?</p> <p>12 A. No.</p> <p>13 Q. Why not?</p> <p>14 A. We don't do that.</p> <p>15 Q. What don't you do?</p> <p>16 A. An arrest warrant, I would have no reason to request</p> <p>17 an arrest warrant. I arrested her and placed her into jail. A</p> <p>18 warrant would be if she failed to, I guess -- well, if I -- if</p> <p>19 I didn't know where she was and couldn't arrest her at the time</p> <p>20 that I wanted to arrest her, then I would request -- well,</p> <p>21 actually, I would just LODI (phonetic) the case with the</p> <p>22 prosecutor's office and they would put out a warrant out for</p> <p>23 her arrest when she didn't show up at court. So I guess it</p> <p>24 would be -- not be my way of operating.</p> <p>25 Q. Well, not your way of operating, but why did you</p>